

VIA ECFS

November 15, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**EX PARTE FILING OF ENCINA COMMUNICATIONS CORPORATION
RE NOTICE OF PROPOSED RULE MAKING
ET DOCKET 18-295 UNLICENSED USE OF THE 6 GHZ BAND AND
EXPANDING FLEXIBLE USE IN MID-BAND SPECTRUM
GN DOCKET NUMBER 17-183**

Dear Ms. Dortch:

Encina Communications Corporation (ECC) responds to the filing of November 5, 2019, to Chairman Pai by Members of the Unlicensed Spectrum Community.

I. DISCUSSION

Once again, Members of the Unlicensed Spectrum Community are proposing to disrupt commerce, impact critical communications infrastructure, and endanger the public safety by completely ignoring the cases where randomly deployed unlicensed devices located near Fixed Service (FS) stations will cause harmful or catastrophic interference -- total link failure -- which would continue until the source or sources of the interference is identified and the appropriate action taken to eliminate it.

Through the use of the industry-accepted Path-Loss equation ...

$$Pl = 96.6 + 20\text{Log } F + 20 \text{ Log } D + \text{Other Losses}$$

... it is easily shown¹ that random deployment of unlicensed devices without AFC will cause harmful and catastrophic interference to existing and future FS stations -- disrupting commerce, impacting critical communications infrastructure, and endangering public safety.

There has not been a single filing to dispute this fact since it was put forward in ECC's filing of October 1, 2019.

II. CONCLUSION

The random deployment of unlicensed devices without AFC must not be allowed, especially when a safe, simple, inexpensive and proven approach -- Safe Area Coordination With AFC of Unlicensed Devices -- is before the Commission².

¹ See Exhibit A

² ECC ex parte filing March 14, 2019. Also see ECC Experimental License WK2XJZ

Respectfully submitted.

Michael Mulcay, Chairman & CTO

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